

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

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v.

CRIM. NO. RWT-11-0091

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WILLIAM CASSIDY,

Defendant.

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**CONSENT MOTION FOR FILING GOVERNMENT OPPOSITION MOTIONS
RESPONSES AND DEFENDANT'S REPLY OUT OF TIME**

The United States of America, by and through its attorneys and with the consent of counsel for the Defendant, hereby seeks permission to file its opposition to defendant's Motions on September 2, 2011; and Defendant hereby seeks permission to file its Reply on or before September 19, 2011, and in support thereof states as follows:

1. By Order dated May 13, 2011, this Court set motions deadlines, including a deadline for the Defendant to file his pretrial motions by July 15, 2011; for the government to file its responses by August 12, 2011; for the Defendant to file his reply by August 26, 20011; and, for the Motions hearing to take place on September 19, 20911.

2. Original counsel for the government has left the Office and the case was reassigned to the undersigned on or about August 1, 2011. Given the number and complexity of Defendant's motions, the undersigned's schedule and lack of previous involvement in the case did not permit him to evaluate the Defendant's Motions or respond by August 12, 2011. The undersigned contacted defense counsel and the parties agreed to an extension until September 2, 2011 for the government to file its Opposition motions. At that same time, the government agreed that the Defendant could file his Reply on or before September 19, 2011.

3. In the interim, the Motions hearing was rescheduled to October 4, 2011. The dates to which the parties agreed will not interfere with the currently-scheduled Motions hearing date.

4. For the foregoing reasons, the parties consent to a change in the deadlines for the filing of Opposition and Reply motions that will not otherwise interfere with the Motions hearing date.

WHEREFORE, the parties request that the Court grant the Consent Motion to file the government's Opposition and the Defendant's Reply out of time. A draft Order is attached for the convenience of the Court.

Respectfully submitted,

Rod J. Rosenstein
United States Attorney

By: _____/s/
David I. Salem
Assistant United States Attorney
U.S. Courthouse, Suite 400
6500 Cherrywood Lane
Greenbelt, Maryland 20770

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Defendant.

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ORDER GRANTING CONTINUANCE

Upon consideration of the Consent Motion for Continuance of the deadlines for filing the government's Opposition motions and the Defendant's Reply, and there being good cause shown, it is this _____ day of _____ 2011

HEREBY ORDERED that the government shall file its Opposition Motions on or before September 2, 2011, and it is

FURTHER ORDERED that the Defendant shall file his Reply on or before September 19, 2011.

Roger W. Titus
United States District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2011, a copy of the foregoing Consent Motion and proposed order was sent ECMF to: Ebise Bayisa, Esq., and Lauren Case, Esq., Office of the Federal Public Defender, 6411 Ivy Lane, Suite 710, Greenbelt, MD 20770.

David I. Salem
Assistant United States Attorney